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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

LOS ANGELES PRESS CLUB,
STATUS COUP,

PLAINTIFFS,

v.

CITY OF LOS ANGELES, a municipal
entity, JIM MCDONNELL, LAPD
CHIEF, sued in his official capacity;

DEFENDANTS.

Case No. 2:25-CV-05423-HDV-E

Hon. Hernan D. Vera

**DECLARATION OF MONTEZ
HARRIS**

DECLARATION OF MONTEZ HARRIS

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3 1. I have personal knowledge of facts below and could testify
4 competently to these facts if I were asked to testify as witness.

5 2. My name is Montez Harris. I am a freelance photographer based in
6 Los Angeles, California. I have worked for a number of small publications, like
7 Hype Magazine.

8 3. I was present at the ICE protests in Los Angeles on June 8th and 11th
9 to document the protests in my capacity as a member of the press. During this
10 time I was repeatedly shot at, nearly arrested, then run down and shot by three
11 LAPD officers on horseback.

12 4. While documenting the protests, I carried two large, professional
13 cameras. I wore a press pass. I had business cards that identified me as press. It is
14 my practice to inform law enforcement that I am a member of the press whenever
15 the circumstances allow me to do so.

16 5. On June 11th, I was present documenting the protests as a member of
17 the press at Grand Park near City Hall. I carried two large, professional cameras,
18 and for most of the day I had a visible press pass. During the course of my
19 documentation, I had a conversation with an LAPD officer on horseback at Grand
20 Park. During the course of my conversation with the officer I believe I informed
21 the officer that I was a member of the press.

22 6. Shortly after this conversation, a dispersal order was issued. As I
23 turned to leave, the officer on horseback tried to grab me. Another officer on
24 horseback then approached and pinned me between the two horses. The officers
25 threatened to hit me with their batons and ran into me from behind with their
26 horses, telling me that I wasn't leaving fast enough. As I turned around to avoid
27 being trampled, I was hit by the horse again. Immediately after this, another
28

1 officer approached from behind me and shot me in the back of my leg with large
2 caliber less than lethal munition. After this, I was able to get away.

3 7. Though the incident with the mounted officers was my most
4 dramatic and painful interaction with LAPD I had several other encounters which
5 I believe violated my rights as a member of the press. On June 8th, I was present
6 in Downtown Los Angeles, near LA City Hall. While documenting the protests as
7 a member of the press, I was shot in the foot and the leg by less lethal munitions
8 fired by the LAPD.

9 8. Additionally, On June 8th at approximately 7:25pm, I was kettled
10 with a group of protesters and nearly arrested by the LAPD. I was holding my
11 two large cameras, and I repeatedly informed officers that I was a member of the
12 press. Despite informing officers I was press, LAPD officers as part of a larger
13 police lines pushed myself and the group I was part of into a small area against a
14 wall. We were surrounded by police lines and could not leave that area. Since
15 LAPD would not acknowledge my obvious presence as a member of the press I
16 began to carefully climb onto the wall I was against to leave the protest. When I
17 did so I was threatened by an officer who told me that if I didn't get down, they
18 would shoot me. If the officer had shot me, it would have been particularly
19 dangerous as I was not on level ground and if I fell I would have been seriously
20 injured. However, I knew I had a right to be there as a member of the press, and I
21 was already almost on the other side of the short wall by the time the officer
22 threatened me. After climbing over the wall, I left the protest and went home.

23 9. If I was not shot, threatened, and nearly arrested on June 8th I would
24 have stayed and further documented the protests. However, as a father of young
25 children I did not think that I could risk staying because it seemed very probable
26 that LAPD would either seriously injury me or arrest me even though I was
27 obviously present at the protest as a member of the press.

28 10. I have seen the video posted at
<https://www.instagram.com/reel/DKyS2XzRXSo/> and lodged with the Court has

1 Exhibit 011. The video is an accurate depiction of LAPD using unlawful force
2 against me on June 11th, 2025.

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4 I declare under penalty of perjury under the laws of the state of California that the
5 foregoing is true and correct. Executed this 30th day of June, 2025 in Los Angeles
6 California.

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9 Montez Harris
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